

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )

v. )

ADAM ELLARD, )

Defendant )

Case No. 04-10168-PBS

GOVERNMENT'S MOTION TO SEAL

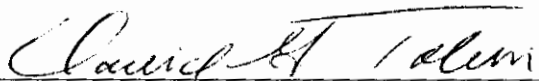
The United States Attorney hereby respectfully moves the Court to seal the Government's Motion for Downward Departure Based on Substantial Assistance, this motion and the Court's order on this motion. As grounds for this motion, the government states that public disclosure of these materials would likely jeopardize the safety of the defendant.

Dated: June 16, 2005

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:



DAVID G. TOBIN  
Assistant U.S. Attorney

8/19/05  
allan. J. Paul S. Sans